

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

)	
JOYCE CHRISTIE)	
	Plaintiff,)	
v.)	Civil Action No. 05-11830 NMG
)	
HARTFORD LIFE GROUP INSURANCE)	
COMPANY as successor to CNA GROUP)	
LIFE ASSURANCE COMPANY)	
	Defendant.)	
)	

JOINT STATEMENT

Pursuant to the Notice of Scheduling Conference and Local Rule 16.1, the parties submit the following proposed scheduling plan.

FACTS

Plaintiff claims to be entitled to long-term disability benefits under a long-term disability plan (the “Plan”) issued by Defendant. Defendant denies that Plaintiff is entitled to benefits under the Plan. Plaintiff worked for the Fall River Housing Authority as an Assistant to the Housing Manager until August 30, 2002. Defendant received Plaintiff’s claim for long-term disability benefits on November 14, 2002. After an investigation, Defendant determined that Plaintiff was not disabled under the Plan and denied Plaintiff’s claim on February 3, 2003. Plaintiff appealed the denial on March 7, 2003 and Defendant upheld their denial on April 25, 2003. Plaintiff subsequently filed this action containing claims for (1) breach of contract; (2) violation of M.G.L. c. 93A and 176D and (3) breach of the covenant of good faith and fair dealing.

PROPOSED SCHEDULING PLAN

1. Rule 26 Automatic Disclosures

The parties will exchange initial disclosures within 14 days after the Scheduling Conference as required by Fed.R.Civ.P. 26(a)(1) and Local Rule 26.2 (January 3, 2006).

2. Close of Discovery

All discovery to be completed by September 29, 2006, and in accordance with the Federal Rules of Civil Procedure and the Local Rules.

3. Expert Disclosures

A party proposing to utilize an expert(s) shall disclose the expert(s) and their report(s) no later than July 18, 2006. A party opposing an expert, shall disclose the expert(s) and their report no later 45 days after the other party discloses his/its expert but under no circumstance later than September 1, 2006. This provision shall not relieve a party of obligations under Rule 26(a)(2).

4. Motions for Summary Judgment

Motions for Summary Judgment shall be filed no later than 90 days before the date established by the Court for trial, Oppositions to Motions for Summary Judgment shall be filed within 21 days thereafter.

CERTIFICATION OF COUNSEL AND PARTIES

The parties will submit their respective certifications at or before the Scheduling Conference or shortly thereafter.

Respectfully Submitted,

Plaintiff Joyce Christie

Defendant Hartford Life Group Insurance
Company,

By her attorney,

By its attorney,

/s/Jonathan M. Feigenbaum

Jonathan M. Feigenbaum, BBO # 546686
Stephanie M. Swinford, BBO # 654135
Phillips & Angley
One Bowdoin Square
Boston, Massachusetts 02114
(617) 367-8787
(617) 227-8992 (fax)
Email: JonF@phillips-angley.com

/s/Katherine R. Parsons

David B. Crevier, BBO # 557242
Katherine R. Parsons, BBO # 657280
Crevier & Ryan, LLP
1500 Main Street, Suite 2020
Springfield, MA 01115
(413) 787-2400
(413) 781-8235 (fax)
Emails: dcrevier@crevierandryan.com
kparsons@crevierandryan.com

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on Plaintiff's counsel by first class U.S. Mail, postage prepaid this 13th day of December 2005.

/s/Katherine R. Parsons